Supreme Court, U.S.
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IN THE

# Supreme Court of the United States

OCTOBER TERM, 1985

BROTHERHOOD OF LOCOMOTIVE ENGINEERS AND UNITED TRANSPORTATION UNION, *et al.*,
*Cross-Petitioners,*

v.

INTERSTATE COMMERCE COMMISSION, *et al.*,
*Cross-Respondents.*

**On Petition for a Writ of Certiorari to the United States Court of Appeals for the District of Columbia Circuit**

## BRIEF OF RESPONDENTS UNION PACIFIC RAILROAD COMPANY AND MISSOURI PACIFIC RAILROAD COMPANY IN SUPPORT OF CROSS-PETITIONS

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January 1986

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Respondents Union Pacific Railroad Company and Missouri Pacific Railroad Company, intervenors in the court below, submit this brief in support of the cross-petitions for certiorari filed by the Brotherhood of Locomotive Engineers and the United Transportation Union.[1]

Union Pacific and Missouri Pacific support the unions' cross-petitions for the reasons set forth in their brief in support of the petitions for certiorari filed by the Interstate Commerce Commission and the Missouri-Kansas-Texas Railroad Company in Nos. 85-792 and 85-793.

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[1] The listing required by Rule 28.1 appears in Appendix A of the Brief of Respondents Union Pacific Railroad Company and Missouri Pacific Railroad Company In Support of Petitions in Nos. 85-792 and 85-793.

To resolve the conflict among the Circuits created by the decision below, and to preclude the regulatory confusion and industry chaos that the D.C. Circuit Court's decision would entail, this Court should grant one or more of the pending petitions to review the decision below.

Respectfully submitted,

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